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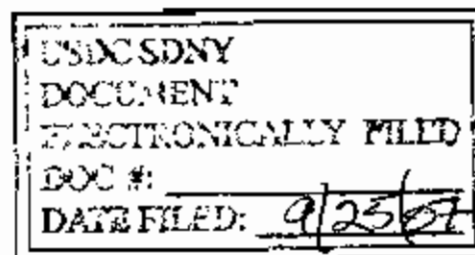
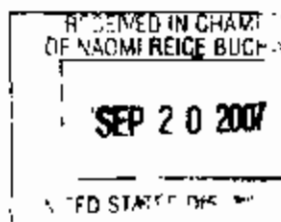
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Our ref: 297-06/ROSS

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VIA FAX NO: 212 805 7927

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Suite 2270
New York, New York 10007



RE: Uniwire Trading LLC v. M/V WLADYSLAW ORKAN, et al.
07 CV 3427 (NRB)

Dear Judge Buchwald:

We represent the Defendants in the captioned litigation. Recently, the Court granted us telephonic permission to file a Motion to Dismiss on the basis of a foreign forum selection clause contained in the ocean bill of lading contract of carriage. In conjunction with this Motion, we will need evidence from a Polish attorney in support of the Motion.

After conferring with counsel for Plaintiff, we agreed to propose the following briefing schedule for your consideration:


October 18, 2007.....Motion to be filed;
November 9, 2007.....Opposition papers are due; and
November 23, 2007 ... Reply to the Opposition papers are due.

So Ordered.
Naomi Reice Buchwald
USDC
9/24/07

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Under the circumstances, we respectfully ask that the Court adopt the aforementioned proposed briefing schedule and thank you in advance for your anticipated cooperation.

Respectfully submitted,
FREEHILL HOGAN & MAHAR, LLP



James L. Ross

ROSS:lu

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